UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re McCRAY, et al, Litigation

03-cv-09685 (DAB) (RLE)

MOTION TO INTERVENE AND OPPOSE THE UNSEALING OF CERTAIN DISCOVERY MATERIAL

Upon the Memorandum in Support of the Motion to Intervene and Oppose the Unsealing of Discovery Documents, dated September 12, 2014, and all prior papers and proceedings in this action, The New York State Department of Corrections and Community Supervision moves to intervene and for an order denying the unsealing of material under confidentiality designations in this litigation, to the extent requested in the Memorandum of Law, and granting such other and further relief as this Court deems just and proper.

Dated: New York, New York September 12, 2014

s/ Thomas J. Goetz

Thomas J. Goetz, Esq.
Office of the Counsel
New York State Department of Corrections and
Community Supervision
1220 Washington Avenue
Albany, NY 12226-2050
(518) 457-4951; (518) 457-7555 (fax)
Thomas.Goetz@doccs.ny.gov

To: Counsel of Record (all by ECF)